

US EPA RECORDS CENTER REGION 5



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6/7/96 A.2

Sheri: Per your request, I am providing the following information on the issues raised by Ron Frehner in my telephone conversation with him on June 5, 1996.

ISSUE ONE: *The Respondents have budgeted \$7 million for this year to spend on the pilot studies, perimeter groundwater containment system, dewatering/barrier wall and the pre-design studies. The Respondents are concerned that without approvals they will not be able to implement these systems and that undue monies are being expended on the pre-design studies.*

*This issue is closely tied to Issues Three and Four. All parties involved have had an impact on the delay of the schedule. Unrequested unilateral changes submitted by the Respondents requires additional review time by the Agencies. These revisions have been subject to continued debate between the Respondents and the Agencies. By eliminating these revisions will help expedite the process. From the Agencies end, we need to re-evaluate the length of time from document submission to release of final Agencies comments. We need to work closely together to ensure that we are providing feedback on document submittals within 30 days. From IDEM, I can try to provide formal comments to USEPA within three weeks of document submission. This would allow USEPA a week to review IDEM's comments. Furthermore, if this would be of assistance to USEPA, I would be willing to compile comments from USEPA, BVWS and IDEM into one complete list to provide to USEPA to review, revise and include with their approval/disapproval letter. This would alleviate the USEPA from taking additional time to retype and eliminate duplicate comments. This could be completed within the initial three week time frame provided that all comments from the other parties were submitted in a timely manner. Please let me know if you would be amenable to this or if there is another way the State could facilitate and expedite the process.

ISSUE TWO: *The Respondents feel that all of the additional work required by the Agencies is making them re-do the work already performed in the RI. The Respondents feel that the need to confirm whether something is 5ppb or 10ppb is irrelevant when there is contamination at 20,000ppb.*

*The Respondents are in pre-design mode, while the Agencies do not feel that the nature, character and extent was fully defined in the RI Report. The additional investigatory work being requested by the Agencies is in an effort to clearly understand the magnitude and areal extent of contamination at the site. This information will help in developing the treatment systems to ensure that these systems have the capacity to treat all of the contamination, to ensure that the contamination will be captured by the system, to define the extent of the groundwater plume in both the upper and lower aquifers, and to select an appropriate monitoring network to evaluate the effectiveness of the treatment system. Furthermore, in previous technical meetings, correspondence and documents, the Respondents agreed to rationale behind the work being conducted. Specifically, in the Pre-Design Work Plan (August 21, 1995), pages 4-3 to 4-5 discuss the groundwater contamination extent investigation..."The fifth step is to determine the extent of groundwater contamination in the Upper Aquifer consistent with the approved Tracer investigation plan following the procedure described below. The extent of groundwater

contamination will be delineated in the field using VOCs detected in groundwater samples collected from temporary sampling points as an *indicator of the extent* of contamination." (Emphasis added) The seventh step... "The additional wells will be installed to *verify the extent* of groundwater contamination. Based upon available information, three Upper Aquifer wells are proposed at this time (MW-25, MW-26, and MW-27) at locations shown of Figure 4-2." (Emphasis added) "The proposed wells would be located at the limits of this previously identified VOC plume (i.e., non-detection of VOCs in the Tracer Investigation)". In addition, the document states on page 4-4, "In the cases of the wetlands, North of the Grand Trunk Railroad, and the vicinity of MW-7, the goal of the Tracer Investigation is to locate the edge of the plume (i.e., non-detection of VOCs in the Tracer Investigation) leading to the installation of a monitoring well." IDEM is unclear as to why the Respondents disagree with the Agencies approach to this investigatory work when they clearly agreed to do it in this Work Plan. Particularly of interest is the statement that certain well locations (J,L,M) have no technical basis. When referring to the text in the Pre-Design Work Plan and figure 4-2, the Respondents had initially proposed wells to be placed near the location of J (MW-25) and L and M (MW-26). The Agencies should request clarification on why the Respondents identified these locations as data gaps in August 1995 and have now retracted. With regard to this being a duplication of effort to the RI, that statement is erroneous. The work conducted under the pre-design investigation (which was agreed to by the Respondents) was intended to build upon the RI studies. More specifically, investigatory activities were limited, at best, for the wetlands, northern portion of the site and the southern tip of the plume. The southern edge of the plume was never clearly identified, many unanswered issues were left about the wetlands, etc.

ISSUE THREE: *The Respondents feel that they are moving forward in a good faith attempt on the Perimeter Groundwater Containment System without agency approval.*

*Please see comment for Issue One. Specifically for the Perimeter Groundwater Containment System, both IDEM and the USEPA are on board with the design/build approach for this system. In an effort to provide a comfort level to the Respondents, the Agencies need to provide comments on the 50% Design Submittal (March 1996) for the Perimeter Groundwater Containment System ASAP. It may be appropriate to have a date to provide the Respondents for the submittal of formal comments on this document.

ISSUE FOUR: *The Respondents are concerned about the length of time it takes for the Agencies to provide formal comments.*

*Please see comment for Issue One. Outstanding formal comments which need to be provided to the Respondents include:

- * 50% Design Submittal, Perimeter Groundwater Containment System (March 1996)
- * Dewatering/Barrier Wall Alignment Investigation Report (March 1996)
- * Technical Memorandum, Upper Aquifer Investigation; second draft (May

3, 1996)

- * Perimeter Groundwater Containment System RD/RA Work Plan (April 1996)
- * Lower Aquifer Investigation Report (May 1996)
- * Approval Letter on the Alignment location (April 1996)

Prior to the meeting, the Agencies should set a schedule for the submission of the aforementioned formal comment letters.

ISSUE FIVE: *The Respondents feel that the Agencies are being arbitrary in the selection of additional well locations for the upper aquifer.*

*The rationale for the well locations was discussed extensively in our last technical meeting and followed up in a letter from USEPA shortly after. You stated that BVWS provided an additional justification for the well locations to USEPA. I would like to have a copy of this memo.

ISSUE SIX: *The Respondents are concerned that a letter approving the alignment location has yet to be provided.*

*As stated in our telephone conversation on Thursday, June 6, 1996, you will be finalizing and sending out the letter approving the alignment location by close of business Friday, June 7, 1996.

Let me know what you think. We can discuss this in further detail on Monday or at our pre-meeting on Tuesday. I have made several overheads for our meeting to facilitate our discussions.

